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(1896-1959)
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(1925-1982)
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(1924-2008)
THOMAS R. ETHRIDGE
(1918-2010)

April 26, 2022

Robert Mims
Office of the US Attorney
900 Jefferson Avenue
Oxford, MS 38655
rmims@usadoj.gov

Re: United States of America v. Jamarr Smith, et al.
U.S.D.C. for the Northern Dist. of MS; Oxford Div.; No. 3:21-CR107-NBB-RP
Our File No.: 21-7126

Dear Robert:

I am writing to request some additional discovery in the above-captioned case. I request discovery as follows:

1. Produce all documents and records, including raw data, provided by Google as a result of the geofence warrants.
2. Produce all information about how law enforcement officials analyzed the Location History data to determine devices that were "relevant to the investigation," including:
 - a. how law enforcement officials made determinations about which devices were "relevant";
 - b. how law enforcement officials made determinations about which devices were not "relevant";
 - c. what data law enforcement officials relied on to make these determinations, including any additional information or analysis provided by Google;
 - d. a list of any "anonymized" identifiers believed to belong to Jamarr

Exhibit "E"

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Smith.

3. The name(s) and training, certifications, and qualifications of the law enforcement official(s) who analyzed the Location History data provided by Google.
4. For all law enforcement agencies and officers involved in this case, copies of all:
 - a. communications and correspondence between agents involved in the investigation and Google employees/representatives regarding the geofence warrants in this case;
 - b. arrest and investigative reports from any officers/analysts who used the Location History data during this case, regardless of whether the Location History data is specifically referenced in the report or not;
 - c. training materials in the possession of law enforcement agencies for obtaining and using geofence warrants; and
 - d. internal policies, guidelines, training manuals, or presentations concerning use of geofence warrants;
5. For each extraction completed on each digital device seized from Jamarr Smith, produce:
 - a. All exported reports in native format (i.e. PDF, Excel, HTML, UFDR, etc.)
 - b. The UFED Reader;
 - c. All data as originally produced by Cellebrite UFED to include the original folder structure and all files;
 - d. All Cell Phone Forensic Extraction Files collected with Cellebrite or similar forensic extraction software, such as UFED Files, .BIN (Binary Files), .TAR (or other archival files);
 - e. All Evidence Logs of all digital evidence, including full chain of custody for each item
 - f. Any passwords (security or encryption), PIN, pattern locks collected during the law enforcement investigation to unlock said devices.
 - g. Any Cellebrite Project files (.pas files)

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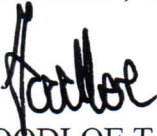
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- h. Any Cellebrite Multiple Dumps (UFDX files)
- i. Any photographs taken of the device at time of seizure and examination
- j. Any notes written by police regarding their handling, examination, or analysis of the digital evidence.

Thank you for your assistance in this matter.

Sincerely,

HICKMAN, GOZA & SPRAGINS, PLLC

A handwritten signature in black ink, appearing to read "Goodloe", written over the printed name.

GOODLOE T. LEWIS

GTL/mh